

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DISTRICT

VAUGHAN PERRET
PLAINTIFFS
CHARLES LEARY
TROUT POINT LODGE, LTD, A Nova
Limited Company

PLAINTIFFS

V.

CIVIL ACTION NO. 14-241

DOUGLAS K. HANDSHOE

DEFENDANT

PLAINTIFFS' NOTICE TO REMAND

COME NOW the Plaintiffs, Trout Point Lodge, Limited, Charles Leary, and Vaughn Perret in response to *Defendant's Notice of Removal*, and in opposition thereof, files this their Notice to Remand, based on lack of subject matter jurisdiction, lack of personal jurisdiction, and *stare decisis* would show unto the Court the following:

1. Plaintiff Trout Point Lodge is a Nova Scotia limited company. Plaintiff Charles Leary, and Vaughn Perret are United States citizens resident in Nova Scotia, Canada. Pursuant to the laws of Nova Scotia the Defendant, Douglas K. Handshoe, was found liable, for copyright infringement under the Canada Copyright Act, to the Plaintiffs.

2. The Plaintiffs in this cause of action filed their Memorandum in Opposition to Motion to Remove with this Court on July 8th, 2014, a copy of which is attached hereto as Exhibit "A" and incorporated herein as fully as if copied in words and figures.

3. The Plaintiffs respectfully request that this matter be remanded for lack of subject matter jurisdiction, lack of personal jurisdiction and *stare decisis* and upon a hearing deny any and all

claims of Defendant, Douglas K. Handshoe and assess Mr. Handshoe all of the Plaintiffs attorney fees for his frivolous attempt to remove the enrollment of the foreign judgment in the Circuit Court of Hancock County, Mississippi.

RESPECTFULLY SUBMITTED this the **10th** day of **July, 2014**.

VAUGHAN PERRET, CHARLES LEARY
TROUT POINT LODGE, LTD,
A Nova Scotia Limited Company

By: /s/ M. Judith Barnett
M. JUDITH BARNETT

M. Judith Barnett (MSB #99766)
M. Judith Barnett, P.A.
1911 Dunbarton Dr.
Jackson, MS 39216
Telephone: (601) 981-4450
Facsimile: (601) 981-4717

CERTIFICATE OF SERVICE

I, M. Judith Barnett, hereby certify that I have this day caused to be served, via United States Mail, postage prepaid and properly addressed, a true and correct copy of the foregoing document to the following listed persons:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, MS 39520

SO CERTIFIED, this the **10th** day of **July, 2014**.

/s/ M. Judith Barnett
M. Judith Barnett